

1 Christopher S. Marchese (SBN 170239)  
2 marchese@fr.com  
3 Tyler R. Train (SBN 318998)  
4 train@fr.com  
5 FISH & RICHARDSON P.C.  
6 633 West Fifth Street, 26th Floor  
7 Los Angeles, CA 90071  
8 Tel: (213) 533-4240 / Fax: (858) 678-5099

9  
10 Adam R. Shartzer (admitted *pro hac vice*)  
11 shartzer@fr.com  
12 Ruffin B. Cordell (admitted *pro hac vice*)  
13 cordell@fr.com  
14 Richard A. Sterba (admitted *pro hac vice*)  
15 sterba@fr.com  
16 Ralph A. Phillips (admitted *pro hac vice*)  
17 rphillips@fr.com  
18 Michael J. Ballanco (admitted *pro hac vice*)  
19 ballanco@fr.com  
20 Taylor C. Burgener (SBN 348769)  
21 burgener@fr.com  
22 FISH & RICHARDSON P.C.  
23 1000 Maine Ave., SW, Suite 1000  
24 Washington, DC 20024  
25 Tel: (202) 783-5070 / Fax: (202) 783-2331

26 *Additional Counsel Listed on Signature Page*

27 Attorneys for Defendant  
28 DISH Network Corporation, et al.

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28 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, *et  
al.*,

Defendants.

Case No. 2:23-cv-1043-JWH-KES  
(Lead Case)  
Case No. 2:23-cv-1047-JWH-KES  
(Related Case)  
Case No. 2:23-cv-1048-JWH-KES  
(Related Case)  
Case No. 2:23-cv-5253-JWH-KES  
(Related Case)

**JOINT STIPULATION TO AMEND  
INVALIDITY CONTENTIONS RE  
CLAIM 4 OF '802 PATENT;  
[PROPOSED] ORDER**

1 ENTROPIC COMMUNICATIONS,  
2 LLC,

3 Plaintiff,

4 v.

5 COX COMMUNICATIONS, INC., *et*  
*al.*,

6 Defendants.

7 ENTROPIC COMMUNICATIONS,  
8 LLC,

9 Plaintiff,

10 v.

11 COMCAST, *et al.*,

12 Defendants.

13 ENTROPIC COMMUNICATIONS,  
14 LLC,

15 Plaintiff,

16 v.

17 DIRECTV, LLC, *et al.*,

18 Defendants.

1 Plaintiff Entropic Communications, LLC (“Entropic”) and Defendants AT&T  
2 Services, Inc.; DIRECTV, LLC; CoxCom, LLC; Cox Communications California,  
3 LLC; Cox Communications, Inc.; Dish Network California Service Corporation;  
4 DISH Network Corporation; DISH Network L.L.C.; DISH Network Service L.L.C.;  
5 Comcast Cable Communications, LLC; Comcast Cable Communications  
6 Management, LLC; and Comcast Corporation (collectively, “Defendants”), by and  
7 through their respective counsel, enter into this joint stipulation regarding  
8 representativeness for Section 101 analysis, amending claim construction disclosures,  
9 and amending invalidity contentions regarding claim 4 of the ’802 patent, with  
10 reference to the following facts:

11 WHEREAS, on March 21, 2024, Plaintiff Entropic Communication LLC  
12 (“Entropic”) served amended infringement contentions. The amended infringement  
13 contentions added an allegation that that the above captioned Defendants infringe  
14 claim 4 of the 8,085,802 (“’802 patent”). Before service of these amended  
15 infringement contentions, Entropic’s allegations for the ’802 patent were limited to  
16 claim 3.

17 **NOW THEREFORE**, to minimize the prejudice to Defendants from the  
18 addition of claim 4 of the ’802 patent into the litigation, the Parties, by and through  
19 their respective counsel, hereby **STIPULATE AND AGREE** as follows:

20

21 1. The parties hereby stipulate and agree Entropic’s amendment of its  
22 infringement contentions to allege infringement of Claim 4 of the 802 patent  
23 shall be deemed allowed.

24 2. The parties hereby stipulate and agree that Claim 3 of the ’802 patent is  
25 representative of claim 4 of the ’802 patent for purposes of the 35 U.S.C. §  
26 101 analysis relevant to the pending motions to dismiss. *See* ECF No. 160.

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1       3. The parties hereby stipulate and agree that Defendants shall be permitted to  
2       identify any terms or phrases within claim 4 of the '802 patent that may  
3       require construction by May 10, 2024.  
4       4. The parties hereby stipulate and agree that Defendants shall be permitted to  
5       amend their invalidity contentions regarding claim 4 of the '802 patent by  
6       June 28, 2024.

7  
8       Dated: May 21, 2024

Respectfully Submitted,

9  
10      By: /s/ Christopher S. Marchese  
11           Christopher S. Marchese (SBN 170239)  
12           marchese@fr.com  
13           Tyler R. Train (SBN 318998)  
14           train@fr.com  
15           633 West Fifth Street, 26th Floor  
16           Los Angeles, CA 90071  
17           Tel: (213) 533-4240

18           Adam R. Shartzer (*pro hac vice*)  
19           shartzer@fr.com  
20           Ruffin B. Cordell (*pro hac vice*)  
21           cordell@fr.com  
22           Richard A. Sterba (*pro hac vice*)  
23           sterba@fr.com  
24           Ralph A. Phillips (*pro hac vice*)  
25           rphillips@fr.com  
26           Michael J. Ballanco (*pro hac vice*)  
27           ballanco@fr.com  
28           Taylor C. Burgener (SBN 348769)  
          burgener@fr.com  
          FISH & RICHARDSON P.C.  
          1000 Maine Ave., SW, Suite 1000  
          Washington, DC 20024  
          Tel: (202) 783-5070

29           David M. Barkan (SBN 160825)  
30           barkan@fr.com  
31           FISH & RICHARDSON P.C.  
32           500 Arguello Street, Suite 400  
33           Redwood City, CA 94063

1 Tel: (650) 839-5070  
2

3 Ashley A. Bolt (*pro hac vice*)  
4 bolt@fr.com  
5 FISH & RICHARDSON P.C.  
6 1180 Peachtree Street NE, 21<sup>st</sup> Floor  
7 Atlanta, GA 30309  
8 Tel: (404) 892-5005  
9

10 Oliver Richards (SBN 310972)  
11 orichards@fr.com  
12 John-Paul Fryckman (SBN 317591)  
13 fryckman@fr.com  
14 Fish & Richardson P.C.  
15 12860 El Camino Real, Suite 400  
16 San Diego, CA 92130  
17 Tel: (858) 678-5070  
18

19 Aaron P. Pirouznia (*pro hac vice*)  
20 pirouznia@fr.com  
21 FISH & RICHARDSON P.C.  
22 1717 Main Street, Suite 5000  
23 Dallas, TX 75201  
24 Tel: (214) 292-4073  
25 Fax: (214) 747-2091  
26

27 **Attorneys For Defendants**  
28 **DISH Network Corporation, et al.**

19 Dated: May 21, 2024

20 Respectfully Submitted,  
21

22 By: /s/ April E. Isaacson  
23 April E. Isaacson (SBN 180638)  
24 KILPATRICK TOWNSEND AND  
25 STOCKTON LLP  
26 2 Embarcadero Center, Suite 1900  
27 San Francisco, CA 94111  
28 Telephone: 415-273-8306  
aisaacson@ktslaw.com

29 Sarah Y Kamran  
30 1801 Century Park East, Suite 2300  
31 Los Angeles, CA 90067  
32 Telephone: 310-248-3830  
33 skamran@ktslaw.com  
34

1 Mitchell G. Stockwell  
2 Andrew N. Saul  
3 Christopher S. Leah  
4 Courtney S. Dabbiere  
5 Michael J. Turton  
6 Vaibhav P. Kadaba  
7 1100 Peachtree Street, Suite 2800  
8 Atlanta, GA 30309-4530  
9 Telephone: 404-815-6214  
10 mstockwell@ktslaw.com  
11 asaul@ktslaw.com  
12 cleah@ktslaw.com  
13 cdabbiere@ktslaw.com  
14 mturton@ktslaw.com  
15 wkadaba@ktslaw.com

16 **Attorneys for Defendants Cox  
17 Communications, Inc., Coxcom, LLC,  
18 and Cox Communications California  
19 LLC**

20 Dated: May 21, 2024

21 Respectfully Submitted,

22 By: /s/ Louis Campbell

23 Krishnan Padmanabhan (SBN: 254220)  
24 kpadmanabhan@winston.com  
25 WINSTON & STRAWN LLP  
26 200 Park Ave., Fl. 40  
27 New York City, NY 10166  
28 Tel: (212) 294-6700  
Fax: 212-294-4700

29 Diana Hughes Leiden (SBN: 267606)  
30 dhleiden@winston.com  
31 WINSTON & STRAWN LLP  
32 333 S. Grand Ave.  
33 Los Angeles, CA 90071  
34 Tel: (213) 615-1700  
35 Fax: (213) 615-1750  
36 Brian Ferguson (*pro hac vice*)  
37 bferguson@winston.com  
38 WINSTON & STRAWN LLP  
39 1901 L Street NW  
40 Washington, DC 20036  
41 Tel: (202) 282-5000

1 Fax: (202) 282-5100  
2

3 Saranya Raghavan (*pro hac vice*)  
4 sraghavan@winston.com  
5 WINSTON & STRAWN LLP  
6 35 West Wacker, Dr.  
7 Chicago, IL 60601  
8 Tel: (312) 558-5600  
9 Fax: (312)558-5700

10 Louis Campbell  
11 Winston and Strawn LLP  
12 255 Shoreline Dr  
13 Suite 520  
14 Redwood City, CA 94065  
15 650-858-6500  
16 Fax: 650-858-6400  
17 Email: llcampbell@winston.com

18 DAVIS POLK & WARDWELL LLP  
19 Ashok Ramani (SBN 200020)  
20 David J. Lisson (SBN 250994)  
21 Micah G. Block (SBN 270712)  
22 1600 El Camino Real  
23 Menlo Park, CA 94025  
24 Tel: (650) 752-2000  
25 Fax: (650) 752-2111  
26 ashok.ramani@davispolk.com  
27 david.lisson@davispolk.com  
28 micah.block@davispolk.com

20 **Attorneys For Defendants**  
21 **Comcast Corporation, et al.**

24 Dated: May 21, 2024

25 Respectfully submitted,

26 By: /s/ David S. Frist  
27 David S. Frist (*pro hac vice*)  
28 david.frist@alston.com  
ALSTON & BIRD LLP

1201 West Peachtree Street, Suite 4900  
Atlanta, GA 30309  
Telephone: 404-881-7000  
Facsimile: 404-881-7777

4 Theodore Stevenson, III (*pro hac vice*)  
5 ted.stevenson@alston.com  
6 **ALSTON & BIRD LLP**  
7 Chase Tower  
8 2200 Ross Avenue, Suite 2300  
Dallas, TX 75201  
Telephone: 214-922-3400  
Facsimile: 214-922-3899

10 Yuri Mikulka (SBN 185926)  
11 yuri.mikulka@alston.com  
12 Rachel E. K. Lowe (SBN 246361)  
13 rachel.lowe@alston.com  
14 **ALSTON & BIRD LLP**  
15 333 S. Hope Street, 16th Floor  
16 Los Angeles, California 90071  
Telephone: (213) 576-1000  
Facsimile: (213) 576-1100

17 **Attorneys for Defendants**  
18 **DIRECTV and AT&T**

21 Dated: May 21, 2024

Respectfully submitted,

23 By: /s/ Michael T. Pieja

24 Michael T. Pieja (SBN 250351)  
25 mpieja@goldmanismail.com  
26 Alan E. Littmann (*pro hac vice*)  
27 alittmann@goldmanismail.com  
28 Douglas Jordan Winnard (SBN 275420)  
dwinnard@goldmanismail.com  
Shaun Zhang (*pro hac vice*)

1 szhang@goldmanismail.com.com  
2 Jennifer M. Hartjes (*pro hac vice*)  
3 jhartjes@goldmanismail.com  
4 Kurt A. Holtzman (*pro hac vice*)  
5 kholtzman@goldmanismail.com  
Xaviere N. Giroud (*pro hac vice*)  
xgiroud@goldmanismail.com  
6 **GOLDMAN ISMAIL TOMASELLI**  
7 **BRENNAN & BAUM LLP**  
8 200 South Wacker Dr., 22nd Floor  
9 Chicago, IL 60606  
Tel: (312) 681-6000  
Fax: (312) 881-5191

10 Christina Goodrich (SBN 261722)  
11 christina.goodrich@klgates.com  
12 Cassidy T. Young (SBN 342891)  
13 cassidy.young@klgates.com  
14 Rachel Berman (SBN 352237)  
15 rachel.berman@klgates.com  
16 **K&L GATES LLP**  
17 10100 Santa Monica Boulevard  
18 Eighth Floor  
19 Los Angeles, CA 90067  
20 Telephone: +1 310 552 5000  
21 Facsimile: +1 310 552 5001

22 James A. Shimota (*pro hac vice*)  
23 jim.shimota@klgates.com  
24 Jason A. Engel (*pro hac vice*)  
jason.engel@klgates.com  
25 **K&L GATES LLP**  
26 70 W. Madison Street, Suite 3300  
27 Chicago, IL 60602  
28 Tel.: (312) 372-1121  
Facsimile: (312) 827-8000

29 Peter Soskin (SBN 280347)  
30 **K&L GATES LLP**  
31 4 Embarcadero Center, Suite 1200  
32 San Francisco, CA 94111

1 Tel.: (415) 882-8200  
2 Fax: (415) 882-8220  
3 peter.soskin@klgates.com

4 **ATTORNEYS FOR PLAINTIFF**  
5 **ENTROPIC COMMUNICATIONS,**  
6 **LLC**

7  
8  
9  
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11  
12  
13  
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## **ECF ATTESTATION**

2 I, Christopher S. Marchese, am the ECF User whose identification and  
3 password are being used to electronically file this Joint Stipulation. In accordance  
4 with Local Rule 5-4.3.4, concurrence in and authorization of the filing of this  
5 document has been obtained from the counsel of Plaintiff Entropic Communications,  
6 LLC, Defendants AT&T Services, Inc., DIRECTV, LLC, CoxCom, LLC, Cox  
7 Communications California, LLC, Cox Communications, Inc., Comcast Cable  
8 Communications, LLC, Comcast Cable Communications Management, LLC, and  
9 Comcast Corporation will maintain records to support this concurrence for subsequent  
10 production for the Court if so ordered or for inspection upon request by a party.

/s/ Christopher S. Marchese  
Christopher S. Marchese